

Mori & Partners

Roppongi Hills North Tower 16F, 6-2-31 Roppongi, Minato-ku, Tokyo 106-0032 Japan
TEL: 03-6831-9281 FAX: 03-6800-5542
<https://mps-legal.com/>

From Prohibition to Controlled Access: Understanding Japan's Cannabis Law Reforms

June 1, 2025

Key Words: Japan Cannabis Laws, Cannabis Control Act Japan, Narcotics and Psychotropics Control Act Japan, Medical Cannabis Japan, THC Content Regulation Japan, THC Residue Limits Japan, Cannabis Use Offense Japan, Cannabis Licensing Japan, CBD Legality Japan, CBD Import Regulations Japan, CBD Testing Requirements Japan, Cosmetics Containing CBD Japan, CBD Supplements Japan, Industrial Hemp Japan, Pharmaceutical Cannabis Products Japan, Clinical Trials Cannabis Japan, GMP Compliance Japan, Cannabis Product Seizure Risk, Cannabis Regulatory Compliance Japan, Japanese Legal Counsel Cannabis, Japan Cannabis Market Entry Strategy, Japan Cannabis Industry Compliance

I. Introduction: Why This Matters Now¹

Japan has long maintained some of the strictest cannabis regulations in the world. Under the Cannabis Control Act, enacted in 1948, possession, cultivation, and transfer of cannabis have been criminal offenses, and enforcement has historically focused on prohibiting almost all non-industrial uses. Recreational use remains entirely prohibited, and criminal penalties are severe by international standards.

Two recent legal amendments in 2024 and 2025 mark a major reform of Japan's cannabis regulatory framework. These amendments introduce criminal penalties for use itself, shift the legal focus from regulating plant parts to controlling products based on tetrahydrocannabinol (THC) content, and establish new licensing systems for cultivation. At the same time, they open a narrow legal pathway for the use of cannabis-derived medicines in strictly defined medical contexts.

For overseas companies in the pharmaceutical, wellness, cosmetics, and industrial hemp

¹ This communication is provided as a service to our clients and friends and is for informational purposes only. It is not intended to create an attorney-client relationship or constitute an advertisement, a solicitation, or professional advice as to any particular situation.

sectors, these changes are both a signal of potential market openings and a warning of heightened compliance obligations. While Japan is cautiously introducing channels for medical and industrial cannabis products, its legal framework continues to prioritize public health safeguards and strict law enforcement. Businesses seeking to enter or expand in the Japanese market will need to navigate this dual reality with precision and rigorous adherence to regulatory requirements.

II. Key Legal Changes in 2024 and 2025

The recent amendments in 2024 and 2025 mark a shift in how cannabis is regulated in Japan. Historically, the Cannabis Control Act differentiated between various parts of the cannabis plant—such as seeds, mature stalks, and leaves—prohibiting some while exempting others. Under the revised framework, the focus has moved away from regulating specific plant parts and now centers on the presence of tetrahydrocannabinol (THC) in a product. Any item containing THC above prescribed thresholds is treated as a controlled substance, regardless of its botanical source.²

Further, a new offense has been introduced to criminalize the act of using cannabis itself. Previously, use without possession was not an offense, creating an enforcement gap. The amended law closes this gap by making use punishable by criminal penalties, with evidence often obtained through scientifically validated urine testing.³

In addition, the law now sets precise residue limits for Δ^9 -THC in products. The thresholds vary by product type and are measured in parts per million (ppm), with very low permissible levels intended to prevent any psychoactive effect. Products exceeding these limits are legally classified as narcotics and fall under the strict controls of Japan's narcotics laws.⁴

The cultivation licensing regime has also been amended. There are now two distinct categories:

- **Type 1:** For cultivating low-THC hemp, primarily for industrial uses such as fiber production. Licenses are granted by prefectural governors.
- **Type 2:** For cultivating cannabis plants intended as raw materials for approved medicinal products, regardless of THC concentration. Licenses are issued by the

² “Enforcement of the Act Partially Amending the Cannabis Control Act and the Narcotics and Psychotropics Control Act” by the Ministry of Health, Labour and Welfare.

³ *Id.*

⁴ *Id.*

Minister of Health, Labour and Welfare.⁵

III. Medical Cannabis

Japan's legal framework now provides a narrowly defined route for the use of cannabis-derived medicines. Under the revised law, products containing cannabinoids such as cannabidiol (CBD) or even tetrahydrocannabinol (THC) may be approved for medical purposes, provided they meet strict regulatory requirements and have obtained marketing authorization as pharmaceuticals. This change may open the door for the introduction of medicines already approved in other jurisdictions, such as CBD-based treatments for severe, treatment-resistant epilepsy.

Overseas pharmaceutical companies seeking to bring cannabis-derived medicines into Japan will need to follow the standard drug approval process, which includes clinical testing in Japan, submission of detailed manufacturing and quality control data, and compliance with the country's Good Manufacturing Practice (GMP) requirements. The import and distribution of these medicines will also require narcotics handling licenses, given their classification under Japan's narcotics laws.

IV. CBD and Consumer Products

1. Current Status of CBD Legality in Japan

CBD products are legal in Japan *only if they are derived from non-THC parts of the cannabis plant*, such as the stems and seeds, and contain virtually no THC. They may be marketed as cosmetics, supplements, or food items, but cannot be labeled or advertised as medical treatments.

2. THC Contamination Risk and Mandatory Testing Requirements

Recent regulatory developments have introduced exceptionally stringent THC residue limits in consumer products. For example, the caps include:

- **0.001 % (10 ppm)** for oils
- **0.0001 % (1 ppm)** for edibles, cosmetics, and other forms

⁵ See, "On March 1, 2025, portions of the Act Partially Amending the Cannabis Control Act and the Narcotics and Psychotropics Control Act will come into effect." by the Ministry of Health, Labour and Welfare, available at https://www.mhlw.go.jp/stf/newpage_43079.html?utm_source=chatgpt.com. See also, "Responding to Patients with No Available Treatment Options – Enabling the Use of Cannabis-Derived Pharmaceuticals" by the Liberal Democratic Party of Japan, available at https://www.jimin.jp/news/information/206838.html?utm_source=chatgpt.com

- **0.00001 % (0.1 ppm)** for beverages⁶

Furthermore, importers must comply with stringent quarantine and customs procedures in Japan, which may include THC testing despite prior domestic approval. If a shipment is found to contain any detectable THC, it is automatically classified as “cannabis” under Japanese law, and the shipment is destroyed without possibility of return or re-export. If products already on the market are later found to contain THC, the importer’s name and product may be publicly disclosed by the Ministry of Health, Labour and Welfare, and the products may be subject to mandatory recall.

V. Conclusion and Outlook

Japan’s recent legislative reforms mark a historic, though cautious, step toward allowing the medical use of cannabis-derived products, while maintaining its strict prohibitions on recreational use. It is anticipated that any expansion in lawful access will be narrowly confined to controlled medical channels and regulated industrial applications, underpinned by rigorous licensing and product testing requirements.

For overseas companies, this dual reality may create both opportunity and risk. Compliant businesses—particularly in pharmaceuticals, wellness, cosmetics, and industrial hemp—may find a pathway into a market that has long been closed to cannabis-related products. At the same time, the enforcement environment remains uncompromising. Even minimal THC contamination can result in product seizure, mandatory destruction, and reputational harm, underscoring the need for precise supply chain controls and certified laboratory testing.

In this regulatory landscape, companies entering or expanding in this market should ensure compliance at every stage—from product formulation and testing to import, distribution, and marketing. By aligning strategic goals with the evolving legal framework, businesses can mitigate risk while positioning themselves to benefit from Japan’s gradual but significant regulatory shift.

⁶ See, “The interpretation of Article 2 of the Cabinet Order designating narcotics, narcotic raw plants, psychotropic substances, and narcotic/psychotropic raw materials, and specific examples” by the Ministry of Health, Labour and Welfare

Further contact:



Shinichiro ("Shin") Mori
MANAGING PARTNER

T: +813-6831-9281

E: shinichiro.mori@mps-legal.com